

**From:** [Carlos Sanchez](#)  
**To:** [Rafael Casanova](#)  
**Cc:** [Donald Williams](#); [Anne Foster](#); [Garyg Miller](#)  
**Subject:** Re: Gulfro Draft ROD - As Requested  
**Date:** 09/26/2011 01:59 PM

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Rafael,  
If you have made all those changes to the ROD, I believe that should address all of HQs comments and concerns. Thanks CAS

Carlos A. Sanchez  
Chief, AR/TX Section  
Region 6, Superfund Division (6SF-RA)  
[sanchez.carlos@epa.gov](mailto:sanchez.carlos@epa.gov)  
(214) 665-8507

▼ Rafael Casanova---09/26/2011 01:42:34 PM---Carlos, Don, as requested, attached is the Draft ROD that Anne is giving a final review before placi

From: Rafael Casanova/R6/USEPA/US  
To: Carlos Sanchez/R6/USEPA/US@EPA, Donald Williams/R6/USEPA/US@EPA  
Date: 09/26/2011 01:42 PM  
Subject: Gulfro Draft ROD - As Requested

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Carlos, Don, as requested, attached is the Draft ROD that Anne is giving a final review before placing into concurrence. Gary will also have to review this before concurrence. We still need to format it before final signature (e.g., spacing, etc.).

HQ's comments stated that NAPL is principal threat waste, not ground water. Although I believe we had made that clear in previous drafts, we tried to clarify this in the Draft ROD.

We also removed the word "impractical" to describe treatment of the ground water. Even though we never mentioned a TI Waiver, HQ's seemed to believe we were invoking a TI Waiver for the ground water.

We also removed "biodegradation" from the ROD. Even though we never mentioned MNA in the ROD, HQ's seemed to believe we were trying to implement an MNA remedy and didn't have the lines of evidence.

We removed the phrase concerning FYRs "since hazardous substances will remain onsite in the ground water above levels that provide for unlimited use and unrestricted exposure" to "since hazardous substances will remain onsite above levels that provide for unlimited use and unrestricted exposure." We removed the work "ground water."

We removed these references from several sections of the Draft ROD, but mainly Sections 19.0 (Selected Remedy) and 20.0 (Statutory Determinations).

Generally, HQ's doesn't believe that we have made a case for the legal basis for action, the goals to be accomplished in the action, and the actions taken to mitigate the risks. If you remember, HQ's believed that we should have chosen a "No Further Action Required" alternative.

[attachment "Gulfco ROD 09-26-11a.doc" deleted by Carlos Sanchez/R6/USEPA/US]

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Rafael Casanova, P.G. (Remedial Project Manager, Environmental Scientist)  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-RA)  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Work Telephone # - (214) 665-7437  
Work Telephone Toll-Free # - 1(800) 533-3508  
Facsimile # - (214) 665-6660  
E-Mail - casanova.rafael@epa.gov

Assigned Sites for Investigation and Remediation:  
(<http://www.epa.gov/earth1r6/6sf/6sf-tx.htm>):  
Brine Service Company Superfund Site (Corpus Christi, Texas)  
Donna Reservoir and Canal Superfund Site (Donna, Texas)  
Falcon Refinery Superfund Site (Ingleside, Texas)  
Many Diversified Interests, Inc. Superfund Site (Houston, Texas)  
Palmer Barge Line Superfund Site (Port Arthur, Texas)  
State Marine of Port Arthur Superfund Site (Port Arthur, Texas)